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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA,)	Criminal Case No. <u>08CR0369-JLS</u>
Plaintiff,)	<u>I N D I C T M E N T</u>
v.)	<u>(Superseding)</u>
CHEONG SAU WONG (1),)	Title 8, U.S.C.,
XU JUN LEE (2),)	Sec. 1324(a)(2)(B)(ii) -
Defendants.)	Bringing in Illegal Aliens for
)	Financial Gain; Title 8, U.S.C.,
)	Sec. 1324(a)(2)(B)(iii) - Bringing
)	in Illegal Aliens Without
)	Presentation; Title 18, U.S.C.,
)	Sec. 2 - Aiding and Abetting;
)	Title 8, U.S.C.,
)	Secs. 1324(a)(1)(A)(iii) and
)	(v)(II) - Transportation of
)	Illegal Aliens and Aiding and
)	Abetting

The grand jury charges:

Count 1

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ming Zhou Zhu, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 2

2 On or about January 28, 2008, within the Southern District of
3 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
4 to violate the immigration laws of the United States, knowing and in
5 reckless disregard of the fact that an alien, namely, Ming Zhou Zhu,
6 had not received prior official authorization to come to, enter and
7 reside in the United States, did bring to the United States said alien
8 and upon arrival did not bring and present said alien immediately to
9 an appropriate immigration officer at a designated port of
10 entry; in violation of Title 8, United States Code,
11 Section 1324(a)(2)(B)(iii), and Title 18, United States Code,
12 Section 2.

Count 3

14 On or about January 29, 2008, within the Southern District of
15 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
16 to violate the immigration laws of the United States, knowing and in
17 reckless disregard of the fact that an alien, namely, Ming Zhou Zhu,
18 had come to, entered and remained in the United States in violation
19 of law, did transport and move said alien within the United States in
20 furtherance of such violation of law; in violation of Title 8, United
21 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 4

23 On or about January 28, 2008, within the Southern District of
24 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
25 to violate the immigration laws of the United States, knowing and in
26 reckless disregard of the fact that an alien, namely, Liangneng Jiang,
27 had not received prior official authorization to come to, enter and
28 reside in the United States, did bring to the United States said alien

1 for the purpose of commercial advantage and private financial gain; in
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
3 and Title 18, United States Code, Section 2.

Count 5

5 On or about January 28, 2008, within the Southern District of
6 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
7 to violate the immigration laws of the United States, knowing and in
8 reckless disregard of the fact that an alien, namely, Liangneng Jiang,
9 had not received prior official authorization to come to, enter and
10 reside in the United States, did bring to the United States said alien
11 and upon arrival did not bring and present said alien immediately to
12 an appropriate immigration officer at a designated port of
13 entry; in violation of Title 8, United States Code,
14 Section 1324(a)(2)(B)(iii), and Title 18, United States Code,
15 Section 2.

Count 6

17 On or about January 29, 2008, within the Southern District of
18 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
19 to violate the immigration laws of the United States, knowing and in
20 reckless disregard of the fact that an alien, namely, Liangneng Jiang,
21 had come to, entered and remained in the United States in violation
22 of law, did transport and move said alien within the United States in
23 furtherance of such violation of law; in violation of Title 8, United
24 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 7

2 On or about January 28, 2008, within the Southern District of
3 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
4 to violate the immigration laws of the United States, knowing and in
5 reckless disregard of the fact that an alien, namely, Yuhai Wang, had
6 not received prior official authorization to come to, enter and reside
7 in the United States, did bring to the United States said alien for
8 the purpose of commercial advantage and private financial gain; in
9 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
10 and Title 18, United States Code, Section 2.

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Count 8

12 On or about January 28, 2008, within the Southern District of
13 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
14 to violate the immigration laws of the United States, knowing and in
15 reckless disregard of the fact that an alien, namely, Yuhai Wang, had
16 not received prior official authorization to come to, enter and reside
17 in the United States, did bring to the United States said alien and
18 upon arrival did not bring and present said alien immediately to an
19 appropriate immigration officer at a designated port of
20 entry; in violation of Title 8, United States Code,
21 Section 1324(a)(2)(B)(iii), and Title 18, United States Code,
22 Section 2.

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Count 9

24 On or about January 29, 2008, within the Southern District of
25 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
26 to violate the immigration laws of the United States, knowing and in
27 reckless disregard of the fact that an alien, namely, Yuhai Wang, had
28 come to, entered and remained in the United States in violation of

1 law, did transport and move said alien within the United States in
2 furtherance of such violation of law; in violation of Title 8, United
3 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

4 Count 10

5 On or about January 28, 2008, within the Southern District of
6 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
7 to violate the immigration laws of the United States, knowing and in
8 reckless disregard of the fact that an alien, namely, Xuzai Dong, had
9 not received prior official authorization to come to, enter and reside
10 in the United States, did bring to the United States said alien for
11 the purpose of commercial advantage and private financial gain; in
12 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
13 and Title 18, United States Code, Section 2.

14 Count 11

15 On or about January 28, 2008, within the Southern District of
16 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
17 to violate the immigration laws of the United States, knowing and in
18 reckless disregard of the fact that an alien, namely, Xuzai Dong, had
19 not received prior official authorization to come to, enter and reside
20 in the United States, did bring to the United States said alien and
21 upon arrival did not bring and present said alien immediately to an
22 appropriate immigration officer at a designated port of
23 entry; in violation of Title 8, United States Code,
24 Section 1324(a)(2)(B)(iii); and Title 18, United States Code,
25 Section 2.

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Count 12

2 On or about January 29, 2008, within the Southern District of
3 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
4 to violate the immigration laws of the United States, knowing and in
5 reckless disregard of the fact that an alien, namely, Xuzai Dong, had
6 come to, entered and remained in the United States in violation of
7 law, did transport and move said alien within the United States in
8 furtherance of such violation of law; in violation of Title 8, United
9 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 13

11 On or about January 28, 2008, within the Southern District of
12 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
13 to violate the immigration laws of the United States, knowing and in
14 reckless disregard of the fact that an alien, namely, Liqiu Lin, had
15 not received prior official authorization to come to, enter and reside
16 in the United States, did bring to the United States said alien for
17 the purpose of commercial advantage and private financial gain; in
18 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
19 and Title 18, United States Code, Section 2.

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Count 14

21 On or about January 28, 2008, within the Southern District of
22 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
23 to violate the immigration laws of the United States, knowing and in
24 reckless disregard of the fact that an alien, namely, Liqiu Lin, had
25 not received prior official authorization to come to, enter and reside
26 in the United States, did bring to the United States said alien and
27 upon arrival did not bring and present said alien immediately to an
28 appropriate immigration officer at a designated port of

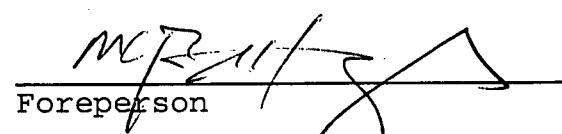
1 entry; in violation of Title 8, United States Code,
2 Section 1324(a)(2)(B)(iii), and Title 18, United States Code,
3 Section 2.

4 Count 15

5 On or about January 29, 2008, within the Southern District of
6 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
7 to violate the immigration laws of the United States, knowing and in
8 reckless disregard of the fact that an alien, namely, Liquiu Lin, had
9 come to, entered and remained in the United States in violation of
10 law, did transport and move said alien within the United States in
11 furtherance of such violation of law; in violation of Title 8, United
12 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

13 DATED: April 16, 2008.

14 A TRUE BILL:

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16 
17 Foreperson

18 KAREN P. HEWITT
United States Attorney

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20 By: 
A. DALE BLANKENSHIP
21 Assistant U.S. Attorney
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